

PELLA CORPORATION,

Plaintiff,

VS.

LIBERTY MUTUAL INSURANCE  
COMPANY,

Defendant.

Law No. 4:11-cv-00273

**AGREED MOTION FOR EXTENSION  
OF TIME FOR DEFENDANT TO MOVE  
OR PLEAD IN RESPONSE TO  
PLAINTIFF'S COMPLAINT**

Defendant Liberty Mutual Insurance Company ("Liberty Mutual"), by their counsel, pursuant to Fed. R. Civ. P. 6(b) and local rule 7(k) moves for an extension of time to move or plead in response to Plaintiff Pella Corporation's ("Pella's") Complaint, and in support thereof, states:

1. Pella filed this action seeking declaratory relief and damages for breach of contract on June 7, 2011.
2. Liberty Mutual was served with Pella's Complaint on June 15, 2011 such that Liberty Mutual must move or plead in response to the Complaint by July 6, 2011.
3. Liberty Mutual seeks a 30-day extension of this deadline, requiring Liberty Mutual to move or plead in response to the Complaint by August 5, 2011.
4. Counsel for Liberty Mutual has conferred in good faith with counsel for Plaintiff, who does not object to the requested 30-day extension.

WHEREFORE, Defendant Liberty Mutual Insurance Company requests that the Court enter an order extending for 30 days the time for Liberty Mutual to move or plead in response to Plaintiff's Complaint.

Dated: June 20, 2011

Respectfully submitted,

/s/ Robert V.P. Waterman, Jr. \_\_\_\_\_

Robert V.P. Waterman, Jr.

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ATTORNEYS FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 20 day of June, 2011, I electronically filed the foregoing **Agreed Motion for Extension of Time for Defendant to Move or Plead in Response to Plaintiff's Complaints** with the Clerk of Court using the ECF system, which will send notification of such filing to the following:

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/s/ Robert V.P. Waterman, Jr.  
Robert V.P. Waterman, Jr.